IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:

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Chapter 11

FIELDWOOD ENERGY LLC, et al.,

Debtors.

Debtors.

Debtors.

Debtors.

S
(Jointly Administered)

Re: Docket Nos 8, 50, 221

CERTIFICATE OF NO OBJECTION TO EMERGENCY MOTION OF DEBTORS FOR INTERIM AND FINAL ORDERS ESTABLISHING NOTIFICATION PROCEDURES AND APPROVING RESTRICTIONS ON (A) CERTAIN TRANSFERS OF INTERESTS IN THE DEBTORS AND (B) CLAIMS OF CERTAIN WORTHLESS STOCK DEDUCTIONS

- 1. On August 4, 2020, Fieldwood Energy LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the "**Debtors**"), filed the *Emergency Motion of Debtors for Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of Interests in the Debtors and (B) Claims of Certain Worthless Stock Deductions* [Docket No. 8] (the "**Motion**").
- 2. Objections to the Motion for parties other than the official committee of unsecured creditors (the "Creditors' Committee") were required to be filed and served by August 20, 2020 at 4:00 p.m. (Prevailing Central Time) (the "General Objection Deadline"). The Creditors' Committee's deadline to object to the Motion was extended to September 8, 2020 pursuant to the Court's *Order Continuing the Hearings on the Motions* [Docket No. 221] (the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

"Creditors' Committee Objection Deadline", and together with the General Objection Deadline, the "Objection Deadlines").

- 3. In accordance with paragraph 40 of the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel files this Certificate of No Objection and represents to the Court that (i) more than one business day has passed since the Objection Deadlines, (ii) the undersigned counsel is unaware of any objection to the Motion, and (iii) the undersigned counsel has reviewed the Court's docket and no objection or responses to the Motion appears thereon.
- 4. Therefore, the Debtors respectfully request entry of the amended proposed final order attached hereto as **Exhibit A** (the "**Amended Proposed Final Order**"). A blackline of the Amended Proposed Final Order against the version filed with the Motion is attached hereto as **Exhibit B**.

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Dated: September 10, 2020 Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez

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-and-

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Proposed Attorneys for Debtors and Debtors in Possession

Certificate of Service

I hereby certify that on September 10, 2020, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez Alfredo R. Pérez